



**Privacy Impact Assessment
for the**

Common Origination and Disbursement (COD)

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Contact Point

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Federal Student Aid (FSA)

U.S. Department of Education



Introduction

During the Definition Phase of the FSA Solution Lifecycle, the System Security Officer must make sure that the team completes the attached Privacy Impact Assessment Questionnaire, must have it reviewed by the Chief Information Officer or equivalent official, and must file the completed form in the system's Security Notebook as part of the system's documentation. This Privacy Impact Assessment must also be made publicly available.

Officials and organizational components involved in the analysis and review of the Privacy Impact Assessment included the following: Department of Education Office of the Chief Information Officer, Federal Student Aid (FSA) CIO Computer Security Officer, and COD management, including the System Security Officer.

1. What information will be collected for the system (Ex. Name, Social Security Number, annual income, etc)?

A. The COD system receives, processes and stores privacy act related data, such as names, social security numbers, current address, date of birth, place of birth, telephone numbers, and dollar amounts.

B. The general public does not have access to COD.

2. Why is this information being collected?

The information is provided by the student applicants and the schools participating in the Title IV Higher Education Student Financial Aid Programs to enable the administration of the Federal Title IV grants and loans by the Department. The Title IV loans and grants are used by eligible students to attend those schools.

3. How will FSA use this information?

A. FSA/COD uses this student-level detail to book loans, account for awarded grants and to enable the Department to reconcile school cash drawdowns from the Treasury to individual student disbursements.

B. This information also is used to ensure the respective schools receive the appropriate amount of dollars during the respective time periods.

4. Will this information be shared with any other agency? If so, with which agency or agencies?

A. Not routinely (This information can be made available for a civil or criminal law enforcement activity that is authorized by law, upon a written request by the agency).



5. Describe the notice or opportunities for consent would be/ or are provided to individuals about what information is collected and how that information is shared with others organizations. (e.g., posted Privacy Notice)

A. Extensive Privacy Act notices are posted at the web site of the Free Application for Federal Student Aid (<http://www.fafsa.ed.gov>). The basis for the data sent to COD by colleges is the FAFSA, which is filled out by student applicants first. The FAFSA is an OMB approved data collection instrument (OMB #1845-0001)

6. How will the information be secured?

A. All information is protected by a PIN or password and is monitored by automated and manual controls.

B. COD is developed and maintained under a contract with Accenture, and is housed within a secure facility run under a subcontract with TSYS Inc., one of the largest credit card processors in the world.

C. Interfacing ED systems are operated for the most part within FSA's Virtual Data Center (VDC), located in Meriden, CT, which provides the respective security controls. The COD data is encrypted as it moves between COD system interfaces.

D. System administrators outside of the VDC provide comparable security controls to protect the system and the information contained therein.

7. Is a system of records being created or updated with the collection of this information? (A system of record is created when information can be retrieved from the system by the name of the individual or an identifying number, symbol or other identifying particular assigned to an individual. Also, in responding to this question a helpful reference may be to the system's System of Record organization step completed in the Definition phase of the Solution Lifecycle process.)

A system of records notification has been submitted to update the previous system of record notification for the Direct Loan Origination System.